

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau Jr.

100 PL 18 P 123

Plaintiff

PLAINTIFF'S OFFICE  
DISTRICT OF MASS.

Vs.

Civil Action  
No. 04 - 10469REK

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

Plaintiff's Motion Opposing Defendant's

Motion To Plaintiff's Motion For Leave To Conduct Additional Discovery And  
Defendant's Cross-Motion For A Protective Order And Plaintiff's Motion  
Clarifying Plaintiffs' Motion For Discovery

The plaintiff requests that the Court deny the defendant's motion opposing plaintiff's motion for expanded discovery and that the Court deny the defendant's cross-motion for a protective order. The plaintiff has acted in bad faith and its motion should be denied for not being timely filed under the Federal Rules. Additionally, the defendant's motion would prejudice the plaintiff's claims, cause undo delays, and place unnecessary costs on the plaintiff and the Court.

Plaintiff now submits an accompanying Memorandum of Law supporting plaintiff's Motion.

Respectfully submitted,



Albert W. Bleau Jr.  
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Dated: February 16, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on February 16, 2006.



Albert W. Bleau Jr.